

Central Valley Regional Water Quality Control Board

30 March 2015

Ms. Nicole Bell
Kern River Watershed Coalition Authority
P.O. Box 151
Bakersfield, CA 93302

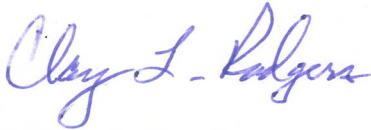
DESIGNATION OF HIGH AND LOW VULNERABILITY AREAS, KERN RIVER WATERSHED COALITION AUTHORITY

Following discussions with Central Valley Regional Water Quality Control Board (Regional Board) staff, Chairman Longley and I are in agreement that the methodology used, and the resulting high vulnerability areas proposed by the Kern River Watershed Coalition Authority (Coalition) are not adequate. Specifically, the proposed method for designating high vulnerability areas did not evaluate intrinsic geologic/hydrogeologic factors, thereby excluding farms located within areas with a high propensity for nitrate exceedances. In addition, the proposed method for designating high vulnerability areas does not appear to evaluate conditions in shallow groundwater areas. Studies in the western portions of the Tulare Lake Basin Area indicate shallow groundwater underlying agricultural lands have documented exceedances for nitrate in first encountered groundwater. Similar shallow groundwater conditions exist in the northwestern portion of the Coalition.

I recognize and commend the Coalition's efforts to reach an agreement on high vulnerability area designations with my staff; however an agreement has not been reached. Waste Discharge Requirements General Order R5-2013-0120 (Order), Section IV.A.4 of the associated Monitoring and Reporting Program, and Revising Order R5-2014-0143 authorize the Executive Officer to make the final determination regarding high vulnerability areas. The enclosed map identifies the final determination regarding high vulnerability areas within the Coalition's boundaries. High vulnerability areas will include both the Coalition-proposed areas and areas identified by the Regional Board on the enclosed map. All fields contacted by and within the blue lines are to be considered high vulnerability areas. We will provide you an electronic version of this map so you may expand the view and overlay it on your map of Member-irrigated fields.

The Order anticipates and allows for the prioritization of future work in high vulnerability areas. Those near disadvantaged communities reliant on groundwater must be the highest priority. Adjustments to the high vulnerability areas may be considered if future data collected demonstrates that it is appropriate to do so.

In your letter dated 20 March 2015, you requested a meeting to further discuss the issues related to high vulnerability area designations. We would be happy to meet with you. Please contact Ms. Kiran Lanfranchi at (916) 464-4839 to schedule an appointment.



Pamela C. Creedon
Executive Officer

Enclosure: High Vulnerability Map, Kern River Watershed Coalition Authority

cc: John Schaap, Provost & Pritchard Consulting Group, Bakersfield CA
Chairman Karl Longley, Central Valley Regional Water Quality Control Board

